

OFFICE OF THE DISTRICT ATTORNEY RICHMOND COUNTY MICHAEL E. McMahon DISTRICT ATTORNEY

With reference to the above-mentioned case, and pursuant to our continuing obligations, the People make the following disclosure: the People are aware that during the time Police Officer James Biagini has been employed by the New York City Police Department:

 In March 2017, the officer did fail and neglect to notify the radio dispatcher at the start of a vehicle pursuit. Additionally, Officer Biagini did fail and neglect to terminate the vehicle pursuit when the risk to uniformed members of service and public outweighed the danger to the community, and forfeited 15 vacation days.

The People reserve the right to move *in limine* to preclude reference to this information, or otherwise to object to its use or introduction into evidence during trial.

Should you wish to discuss this matter, please do not hesitate to call me at hours.

Sincerely,